



**MCI Communications
Corporation**

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March 3, 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

Re: Ex Parte Presentation in CC Docket No. 96-262

Dear Mr. Caton:

On Friday, February 28, 1997, Tim Price, President and Chief Operating Officer of MCI Telecommunications Corporation, Jonathan Sallet, Chief Policy Counsel of MCI, and Brad Stillman, Senior Counsel also of MCI met with Commissioner Susan Ness and Jim Casserly, Senior Legal Advisor to Commissioner Ness. The purpose of the meeting was to discuss MCI's position in the above captioned proceeding as filed in MCI's comments. Attached is a brief outline of the topics discussed.

Due to the late hour of the meeting, two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules the next business day.

Sincerely,

Kimberly M. Kirby

Attachment

cc: Commissioner Susan Ness
Mr. Jim Casserly

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Roadmap to Competition

MCI Communications Corporation

February 28, 1997



MCI ... Entering the Local Market

- MCI Has Switches and Rings In 19 Markets In 14 States
- By 4Q 1997 MCI's Local Service Facilities Will Expand to 31 Markets
- MCI Will Be Expanding Our Reach To Serve Business And Residential Customers



Access Reductions Have Been Flowed Through To Long Distance Consumers

- Local Telephone Monopolies Claim that During the Past Five Years, Access Charges Have Declined by about \$9 Billion.*
- Actual Savings Passed on to Consumers During the Same Period Have Been Approximately \$51 Billion.**

****"USTA Comments on FCC Access Charge NPRM," The United States Telephone Association, December 23, 1996***

******"Long-distance: Public Benefits from Increased Competition," Robert E. Hall, Stanford University, October 1993, updated 1994.***



Estimates of Decline in Toll Rates and Access Costs

	1992	1993	1994	1995	\$ Change
Revenue/Minute	\$0.1663	\$0.1550	\$0.1439	\$0.1346	\$ (0.0317)
Access Charge/Minute	\$0.0651	\$0.0598	\$0.0568	\$0.0519	\$ (0.0132)

*Source: FCC: Telecommunications Industry Revenue; TRS Fund Worksheet Data, 12/96,
adjusted for inflation using CPI



A Market-Based Approach Will Not Work to Reduce Access Charges:

■ Where There Can Be No Competition: Terminating Access

■ Where Competition Has Not Yet Arrived

- Difficulties in Obtaining Interconnection and Access
- Time and Capital-Intensive Steps Needed to Provide Competitive Local Service
- ILECs Can Charge Higher Access Rates for Consumers Without A Competitive Alternative

State Regulators Support Prescriptive Approach

- “[W]e believe carrier access charges reductions of 50% or more over the next few years should be achievable over the next few years without any transfer of costs to local service.” New York Department of Public Service
- “We agree that a prescriptive approach, in the form of phased reductions to access charges, would move prices towards economic costs more quickly.” Florida Public Service Commission
- “In general, Texas PUC advocates use of a prescriptive approach initially, with transition to a market-based approach when true competition exists.” Texas Public Utility Commission



How FCC Can Move Access To Cost

- Adjustments to LEC Price Cap Productivity Factor
- Reinitialize LEC Price Cap to Reflect Actual Cost of Capital
- Bring Terminating Access to Cost
- Create Targets for Originating Access Reductions if Competition Fails to Develop



No Significant Impact on RBOC Revenues

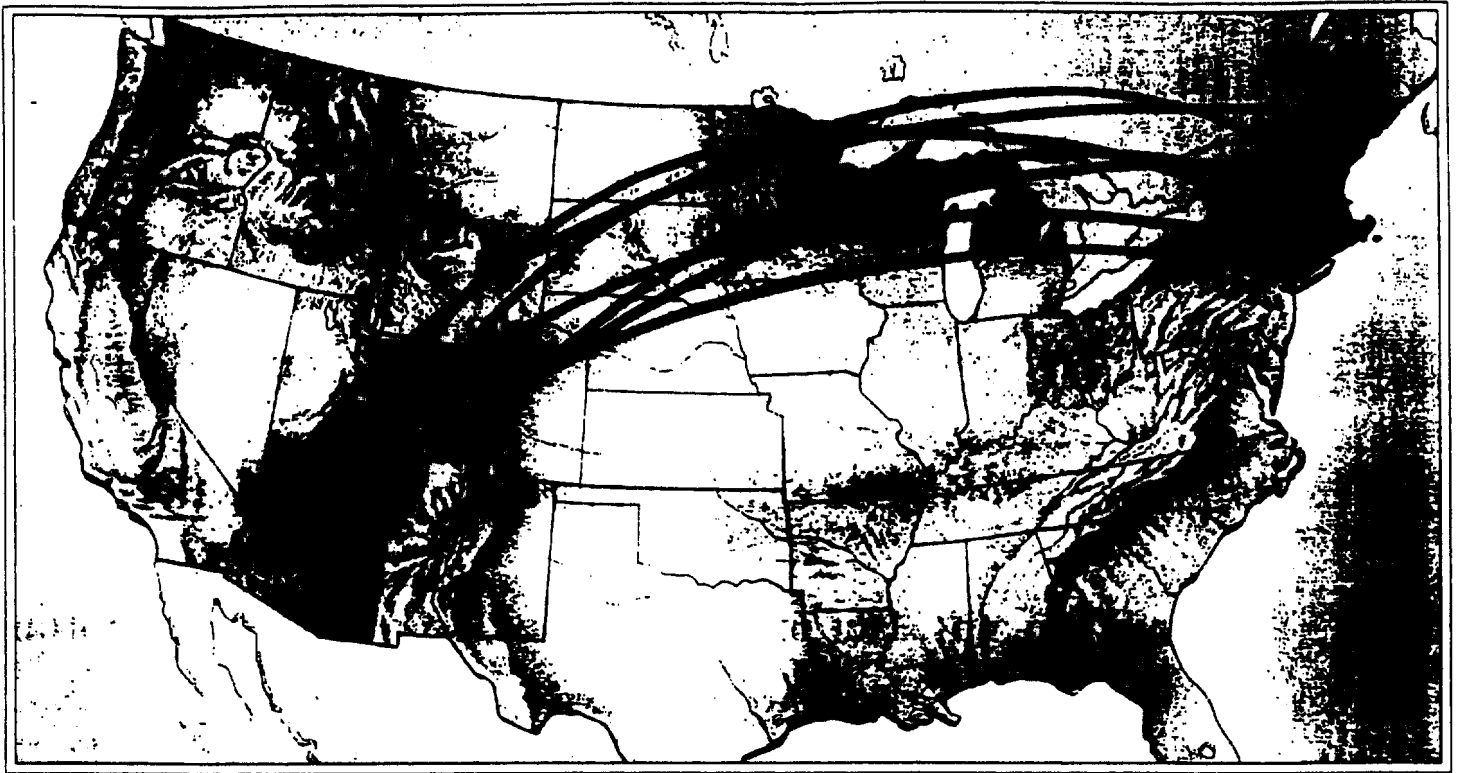
■ Analysts

- “Evidence increasingly suggests that access charges paid by long distance carriers to LECs will decline dramatically over the next several years.” ***Morgan Stanley, Comfort/Kennedy/Flynn, December 4, 1996***
- “For 1997, we have assumed access rates decline 15%, much greater than historical 4-5% reductions.... For 1998, we estimate a 25% decrease in access rates....” ***Morgan Stanley, David Togut, January 17, 1997***



CONCLUSION

- With Mandated Access Charge Reductions Consumers Will See Lower Prices And Competition Will Come More Quickly
- Without Mandated Reductions In Access Charges Competition In The Local And Long Distance Markets Will Be Impaired



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